California Rice

February 20, 2015

Ms. Pamela Creedon, Executive Officer
Central Valley Regional Water
Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, California 95670-6114

RE: COMMENTS TO DRAFT STAFF REPORT: AMENDMENT TO THE WATER QUALITY CONTROL PLAN FOR THE SACRAMENTO AND SAN JOAQUIN RIVER BASINS TO REMOVE THE MUNICIPAL AND DOMESTIC SUPPLY BENEFICIAL USE IN TWELVE CONSTRUCTED AND/OR MODIFIED WATER BODIES IN THE SACRAMENTO RIVE BASIN THAT RECEIVE TREATED MUNICIPAL WASTEWATER FROM THE CITIES OF BIGGS, COLUSA, LIVE OAK OR WILLOWS

Dear Ms. Creedon:

The California Rice Commission (CRC) is involved with the Basin Plan amendment for the Municipal and Domestic Supply (MUN) as part of the Agriculturally Dominated Water Bodies Evaluation. We are providing comments on the amendment to delist MUN from the twelve water bodies, and specifically the four that mention rice: Colusa Basin Watershed, Willows Subarea, Lower Butte Creek Watershed and Sutter Bypass, and Biggs Subarea. Our involvement in the MUN Basin Plan amendment is two-fold:

1) To provide input resulting is an accurate end product, and

2) To provide feedback on any potential effluent into drains supplying water to rice farming operations. Heavy metals negatively impact the rice yields and also cause trade irritants in marketing of the crop. We can provide scientific evaluations, reports and documentation, if necessary.

We are statutory organization representing the entirety of the California rice industry, consisting of 2,500 rice farmers and 19 marketers (CDFA FAC 71000-71138), on their regulatory issues for pesticides, air and water quality, conservation programs and public education. California is the second largest rice producing state in the United States, growing mostly japonica medium grain on an average of 535,000 acres annually (CDFA).

The CRC is also a commodity specific coalition under the Irrigated Lands Regulatory Program (ILRP), Monitoring and Reporting (MRP) Order R5-2010-0805, and the current Long-term ILRP implemented as the Waste Discharge Requirements for Rice Growers (Rice WDR) in the Sacramento Valley, Order No. R5-2014-0032, 27 March 2014. We have had an active monitoring program under the ILRP since 2004.

Specific Comments on the staff report for the proposed amendment

1. On Page 43, the Staff Report mentions the twelve water bodies and states that the types of crops should stay the same. In reality, permanent tree crops are expanding in this area. The Staff Report also reads, *"Through continued implementation of the ILRP and associated actions by the coalitions, water quality in the twelve water bodies addressed by the proposed Basin Plan amendment for constituents of concern directly affected by agricultural operations would not adversely affect, and at least somewhat improve, water quality conditions within the twelve water bodies or downstream receiving waters in the future. Because future agricultural discharge operations to the twelve water bodies are being regulated to protect beneficial uses, agricultural discharges would be no worse, and likely improved, relative to existing conditions, agricultural discharges to the twelve water bodies in the future cumulative condition with the proposed Basin Plan amendment in place would not cumulatively contribute to adverse water quality conditions in receiving waters."* Clarification would be helpful with the final intent of these statements.

In reading the monitoring tables in the Staff Report, we notice discrepancies from the results provided in our Annual Monitoring Report (AMR) from 2004 to 2014. The following list provides the table name and comments specific to the reported results.

2. **Table B.1. Summary of Monitoring Programs in the Lower Sacramento River Basin**

(Page 59)
Program: ILRP
Agency: California Rice Commission
Monitoring Plan: WDR
Note: it is actually the conditional ILRP. The WDR approved 27 March 2014.
Project Term – Ongoing
Date in CEDEN: Yes
The listed constituents include General Water Quality, Organic Carbon, Bacteria/Pathogens, Metals & Trace Elements, Nutrients, Pesticides, and Toxicity. All are correct except Bacteria/Pathogens. The CRC was a collaborator with the University of California, Davis on a CALFED Bay-Delta Program grant, *Development and Implementation of Cultural and Water Management Practices in Rice to Protect Downstream Water Quality.* The constituents for the grant monitoring included *E. coli.* Results concluded that no further monitoring was necessary from rice field drainage.

3. **Table B.2. Monitoring Sites** (Page 63)

Map ID #: 44
Site: CBD#5
Agency: California Rice Commission
Program: Irrigated Lands Regulatory Program
Site Code: 520XCBDWR
Monitoring Notes: Testing for Pesticides and Nutrients did not begin until 2012
Latitude: 39.18325
Longitude: -122.05143

The coordinates we use for CBD5, 520XCBDWR are Latitude 39.1833 N and Longitude -122.0500 W. The CRC has monitored pesticides at this site at least since 1995. Monitoring of rice pesticides at this site actually began in the late 1970s. Under the ILRP, the CRC has monitored pesticides since 2004. Nutrients were monitored under the CALFED grant, so the CRC began evaluating those constituents under the ILRP in 2010. The Central Valley Regional Water Board provided and extension to the CRC ILRP for 2013 and 2014. The extension was in place as the Rice WDR was finalized. Our monitoring consisted of Field Parameters and General Physical Parameters during 2013 and 2014.

4. **Table B.2. Monitoring Sites** (Page 63)

Map ID #: 45
Site: Colusa Basin Drain above KL
Agency: California Rice Commission
Program: Irrigated Lands Regulatory Program
Site Code: 520XCBDKL
Monitoring Notes: Testing for Pesticides and Nutrients did not begin until 2012
Latitude: 39.81212
Longitude: -121.72433

The coordinates we use for CBD5, 520XCBDWR are Latitude 39.8125 N and Longitude -121.7731 W. The same comments apply to Colusa Basin Drain above KL as CBD#5. We refer to the sites as Colusa Basin Drain #5 (CBD5) and Colusa Basin Drain above Knights Landing (CBD1). Rice pesticides were monitored at this site several years ago, so we resumed monitoring in 2003.

5. **Table B.2. Monitoring Sites** (Page 64)

Map ID #: 46
Site: Sacramento Slough near Karnak Bridge
Agency: California Rice Commission
Program: Irrigated Lands Regulatory Program
Site Code: SSB
Monitoring Notes: Blank
Latitude: 38.785
Longitude: -121.6533

We changed our monitoring from the gauging station to the adjacent bridge due to safety concerns from the erosion of the bank from flooding. The information we have includes the Station (Site) Code of 530XSSLNK, Latitude 38.7850 N, and -121.7731 W. Rice pesticides were monitored at this site several years ago, so we resumed monitoring in 2003. All the monitoring information is the same as CBD5 and CBD1.

6. **Table B.3. General Water Quality & Bacteria/Pathogens** (Page 74)

CBD#5
Program: ILRP
Agency: CRC
Monitoring Plan: ILRP

General Water Quality & Bacteria/Pathogens concludes M^1 for which there is no legend. The constituents of EC, DO, pH, Temp and Turbidity are constituents we monitored.

We monitored TDS, but not TSS, which we will include with the Rice WDR starting in 2015. We also did not monitor *E. coli* and Total fecal coliforms in the ILRP, nor are we required under the Rice WDR. As mentioned previously in this document, monitoring of E. coli was under the CALFED Grant, and the results did not justify additional evaluation for rice field discharges.

Colusa Basin Drain above KL
Program: ILRP
Agency: CRC
Monitoring Plan: WDR
Note: it is actually the conditional ILRP. The WDR approved 27 March 2014.
The same comments apply to the Colusa Basin Drain above KL as do for CBD#5.

Sacramento Slough near Karnak Bridge
Program: ILRP
Agency: CRC
Monitoring Plan: WDR
Note: it is actually the conditional ILRP. The WDR approved 27 March 2014.

The same comments apply to the Sacramento Slough near Karnak Bridge as do the Colusa Basin Drain above KL and CBD#5.

7. **Table B. 5b. Metals & Trace Elements Part II** (Page 93)

CBD#5
Program: ILRP
Agency: CRC
Monitoring Plan: ILRP

Minerals & Trace Elements concludes M^2 for which there is no legend. We monitored both dissolved and total copper consistently over the years. Please let us know if the reporting of total copper is necessary.

Colusa Basin Drain above KL
Program: ILRP
Agency: CRC
Monitoring Plan: WDR
Note: it is actually the conditional ILRP. The WDR approved 27 March 2014.

The same comments apply to the Colusa Basin Drain above KL as do for CBD#5.

Sacramento Slough near Karnak Bridge
Program: ILRP
Agency: CRC
Monitoring Plan: WDR
Note: it is actually the conditional ILRP. The WDR approved 27 March 2014.

The same comments apply to the Sacramento Slough near Karnak Bridge as do the Colusa Basin Drain above KL and CBD#5.

8. **Table B. 8. Nutrients & Organic Carbon** (Page 111)

CBD#5
Program: ILRP
Agency: CRC
Monitoring Plan: ILRP
Nutrients & Organic Carbon concludes M^3 for which there is no legend. We monitored Ammonia as N, Nitrate as N, Nitrite as N and Total Organic Carbon (TOC), with the conclusion as M^1.

Colusa Basin Drain above KL
Program: ILRP
Agency: CRC
Monitoring Plan: WDR
Note: it is actually the conditional ILRP. The WDR approved 27 March 2014.
The same comments apply to the Colusa Basin Drain above KL as do for CBD#5.

Sacramento Slough near Karnak Bridge
Program: ILRP
Agency: CRC
Monitoring Plan: WDR
Note: it is actually the conditional ILRP. The WDR approved 27 March 2014.

The same comments apply to the Sacramento Slough near Karnak Bridge as do the Colusa Basin Drain above KL and CBD#5.

9. **Table B. 9. Pesticides & Toxicity** (Pages 116 and 117)

CBD#5
Program: ILRP
Agency: CRC
Monitoring Plan: ILRP
Pesticides (other) concludes $M^{1`}$ for which there is no legend. Toxicity concludes M^S for which there is not legend. Correct, we have monitoring *Hyalella azteca* and *Selenastrum capricornutum*. We also monitored Fathead Minnow and *Ceriodaphnia dubia.*

Colusa Basin Drain above KL
Program: ILRP
Agency: CRC
Monitoring Plan: WDR
Note: it is actually the conditional ILRP. The WDR approved 27 March 2014.
The same comments apply to the Colusa Basin Drain above KL as do for CBD#5.

Sacramento Slough near Karnak Bridge
Program: ILRP
Agency: CRC
Monitoring Plan: WDR
Note: it is actually the conditional ILRP. The WDR was approved 27 March 2014.

The same comments apply to the Sacramento Slough near Karnak Bridge as do the Colusa Basin Drain above KL and CBD#5.

We are not seeking to increase the monitoring requirements for the Rice WDR. Our program is robust in addressing the discharges from rice farming practices. In addition, the Rice WDR will provide trends in the analysis of the monitoring results. Please keep in mind; program implementation of the Rice WDR begins in 2015. The comments we provided are to increase accuracy and allow credit for all results from the CRC surface water monitoring programs.

Sincerely,

Roberta L. Firoved
Industry Affairs Manager

cc: Ms. Anne Littlejohn